

Changes to the IDP subsistence allowance – Resolution 390

Legal Brief

On 18 March 2026, the Government adopted Resolution 390, amending the procedure governing the IDP subsistence allowance under Resolution 332, mostly concerning changes in eligibility and duration of payments. Other elements of the IDP subsistence allowance framework, including payment amounts, the application procedure, and responsible bodies remain unchanged.

Key amendments:

1. Maximum duration of continued support. The period for continuously receiving IDP subsistence allowance payments was extended from four to five terms of six months each, raising the limit of continued support from 24 to 30 months. This means that households already eligible for continuation of IDP subsistence allowance payments under the existing rules (the full list of these groups is set out in paragraph 13 of Resolution 332) may now receive the allowance for one additional six-month period.

2. Children of internally displaced families: The most substantive change concerns children of internally displaced families. Previously, continued payment for IDP children was tied to the household's overall income, meaning that the family's income had to remain below the applicable per capita income threshold to be eligible. Resolution No. 390 changes this approach by restoring payment for children in IDP families for six months, without taking the family's income into account. The payment may be extended for additional six-months terms, as long as the total duration of receipt does not exceed 30 months.

The family must still meet the general eligibility criteria for the IDP subsistence allowance. Specifically:

- the family must have been displaced after 1 January 2022 or have housing destroyed or damaged to the point of inhabitability, and
- must continue to meet the general property criteria, including absence of purchases, or bank deposits exceeding UAH 100,000 (the full list of these criteria is set out in paragraph 7-1 of Resolution 332).

Where these general criteria are met, no additional conditions apply to children under the age of six years. For children between the ages of 6 and 18 years residing in communities beyond areas of active or potential hostilities as per Ministry of Development's Order 376, receipt of the payment is conditional on the child's enrollment in a school in the host community (whether studying in-person, mixed, or remote). This requirement is waived for families residing in areas of active or potential hostilities.

IDP subsistence allowance payments are based on applications by a parent or other legal representative. If the application is submitted before 1 May 2026, payments, if granted, are paid retroactively from 1 February 2026. If submitted later, payments start from the month of application and are not paid retroactively.

3. Pensioners and people who have lost working capacity: Resolution 390 also establishes access to IDP subsistence allowances for certain groups of pensioners and people who have lost working capacity. Under the prior framework, allowance payments for these categories were conditional on the monthly income remaining below a ceiling of four subsistence minima. The amendment does not abolish this threshold; instead, it allows people whose payments were discontinued because their income exceeded the 2025 ceiling (4 x UAH 2,361 = UAH 9,444) to re-apply using the updated 2026 subsistence minimum (4 x UAH 2,595 = UAH 10,380 per month per person). In practical terms, this provision is not a new entitlement but rather a review of eligibility based on the adjustment of the subsistence minimum.

If the application is submitted by 1 May 2026, payment is granted retroactively from 1 January 2026. Applications submitted after that date lead to the payment starting from the month of application.

4. Caregiver exemption. Finally, the Resolution limits the exemption from the requirement for non-employed IDPs of working age to take active steps towards economic self-sufficiency as a condition of continued receipt of the IDP subsistence allowance.

Previously, a caregiver for a child up to the age of six was exempt from the obligation to take measures toward economic self-sufficiency (e.g. register with the Employment Centre, register as private entrepreneur; the full list of these measures is enumerated in paragraph 5-1 of Resolution 332). Under the revised framework, the exemption applies only to a caregiver for a child up to the age of one year or for a child who requires care for a period specified in a medical opinion, but not beyond the age of six years.